

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

SHOW ME SUNSHINE PROPERTIES, LLC,)
)
)
Plaintiff,)
)
)
vs.) Case No. 6:17-CV-03131-RK
)
)
BLUELINES RENTAL, LLC,)
)
)
Defendant and Counterclaim Plaintiff.)

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Plaintiff Show Me Sunshine Properties, LLC (“Show Me Sunshine”) and Defendant BlueLine Rental, LLC (“BlueLine”) (collectively, the “Parties”), by and through their respective counsel of record, hereby jointly move the Court for entry of an Order extending the deadlines in the Court’s Scheduling and Trial Order, entered on July 14, 2017, as follows:

1. The Parties are presently engaged in discovery, including the exchange of written discovery. The Parties intend to schedule depositions as soon as practicable.
2. This Court’s Scheduling and Trial Order (Doc. 17) sets the following discovery and expert deadlines that the parties propose herein to extend:
 - a. All discovery motions shall be filed with the Court on or before October 23, 2017.
 - b. All pretrial discovery shall be completed on or before November 3, 2017.
 - c. Plaintiff shall designate any expert witnesses on or before November 15, 2017;
 - d. Defendant shall designate any expert witnesses on or before December 15, 2017

- e. All expert witness depositions shall be completed by February 1, 2018.
- f. All dispositive motions shall be filed on or before February 15, 2018.

3. The deadlines set forth above have not been previously extended by the Court. The Parties submitted one Joint Motion for Modification of Scheduling Order that was denied for failure to demonstrate a specific need for the requested extension.

4. The parties jointly propose the scheduling deadlines be extended 90 days, resulting in the amended deadlines as follows:

- a. All discovery motions shall be filed with the Court on or before January 22, 2018.
- b. All pretrial discovery shall be completed on or before February 1, 2018.
- c. Plaintiff shall designate any expert witnesses on or before February 13, 2018;
- d. Defendant shall designate any expert witnesses on or before March 15, 2018
- e. All expert witness depositions shall be completed by May 2, 2018.
- f. All dispositive motions shall be filed on or before May 16, 2018.

5. The cause of this Joint Motion to Extend Scheduling Order Deadlines is as follows:

- a. The Parties are currently attempting to resolve discovery disputes regarding written discovery. The resolution of these disputes may have an impact on determining whom to depose and in identifying experts.
- b. The Parties have communicated about scheduling certain depositions already but are unable to identify times they are mutually available within the current Scheduling Order. Counsel for BlueLine will be undergoing surgery and Counsel for Show Me Sunshine needs additional time to determine whom to depose subject to resolution of discovery disputes.

- c. The actions described in the deadlines listed above cannot be adequately completed in the allotted time because of the necessity of sufficiently reviewing the documents prior to completing each additional discovery and expert step.
6. The remaining discovery includes:
 - a. BlueLine deposition of Mr. Geoffrey Shaver. The Parties have corresponded about scheduling the deposition but have been unable to reach a mutually available date within the constraints of the current Scheduling Order.
 - b. Show Me Sunshine depositions. As discussed above, Show Me Sunshine is waiting upon the resolution of the current discovery dispute to determine whom to depose. The Parties have corresponded about potential dates for Show Me Sunshine depositions, once deponents are identified, but have been unable to reach mutually available dates within the constraints of the current Scheduling Order.
 - c. Expert depositions. As discussed above, the Parties are attempting to resolve the current discovery dispute prior to identifying experts. Once experts are identified, the Parties will set deposition dates as soon as possible.
7. This case is currently scheduled for trial on September 5, 2018 and for pretrial conference on August 3, 2018. The requested extension will not affect the scheduled trial date or pretrial conference date.
8. This Motion is filed in good faith, for cause, in the interest of judicial economy, and is not made for any improper purpose.

WHEREFORE, Plaintiff Show Me Sunshine Properties, LLC and Defendant BlueLine Rental, LLC respectfully request the Court grant their Joint Motion to Extend Scheduling Order Deadlines, and enter an Order extending the scheduling deadlines as set forth herein, and for any further relief the Court deems just and proper.

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